

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LOCATION SERVICES IP, LLC,

Plaintiff,

V.

JP MORGAN CHASE & CO., ET AL.,

Defendants.

Civil Action No. 2:15-cv-00435-JRG

LEAD CASE

PLAINTIFF'S ANSWER TO THE JPM'S COUNTERCLAIMS

Plaintiff/Counter-Defendant Location Services IP, LLC ("LSIP") files this Answer to the Counterclaims of Defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., and Chase Bank USA, N.A. (collectively "Defendants" or "JPM") (Doc 19). LSIP responds to the allegations in the Counterclaims by identically numbered paragraph as follows:

1. Admitted as to subject matter jurisdiction over counterclaims. Denied that JPM is entitled to any declaratory relief. Denied as to merits of counterclaims.
- 2-10. Admitted.
- 11-12. Denied that JPM's contentions have any merit.
13. Admitted there is an actual and justiciable controversy for purposes of subject matter jurisdiction over counterclaims. Denied that JPM is entitled to any declaratory relief. Denied as to merits of counterclaims.
14. LSIP incorporates the foregoing paragraphs.
15. Admitted there is an actual controversy for purposes of subject matter jurisdiction over counterclaims. Denied that JPM is entitled to any declaratory relief. Denied as to merits of counterclaims.

16-17. Denied.

18. LSIP incorporates the foregoing paragraphs.

19. Admitted there is an actual controversy for purposes of subject matter jurisdiction over counterclaims. Denied that JPM is entitled to any declaratory relief. Denied as to merits of counterclaims.

20-21. Denied.

22. To the extent necessary, LSIP admits that JPM has purported to make a jury demand.

23. To the extent necessary, LSIP denies that JPM is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, LSIP generally denies any allegation in the counterclaim not specifically admitted above, and LSIP re-alleges infringement, validity and damages, and denies any allegations in the counterclaims adverse to same.

PRAYER FOR RELIEF

WHEREFORE, LSIP respectfully requests that this Court enter judgment denying and dismissing JPM's counterclaims, and that the Court enter judgment in favor of LSIP as requested in LSIP's complaint, as amended or supplemented.

July 20, 2015

Respectfully submitted,

/s/ John J. Edmonds

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ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this date. Any other counsel of record will be served by first class mail.

July 20, 2015

/s/ John J. Edmonds
John J. Edmonds